

Use of Appropriate Analytical Methods for RCRA Analysis:

I would like to applaud EPA for recognizing that regulating doesn't necessarily have to be prescriptive. By giving the regulated community options, we feel we have a stake in our outcome by selecting our remedy.

I think having the option of determining your appropriate method(s) based on DQOs will provide some flexibility to the regulated community. Situations where repeated analysis is needed, such as a RCRA Corrective Action or a WAP for a TSDF, will greatly benefit from this proposed rule. However, smaller entities and operations, such as a SQG trying to perform waste evaluation, will probably not benefit from this.

Being a former state RCRA inspector, EPA needs to be prepared to provide massive support and training to the state programs on how to evaluate and interpret data. EPA must make certain that they have the funding, personnel and resources on board before this ruling is finalized to provide state support. Otherwise, state programs will not have the capabilities to make timely decisions on the massive influx of alternate methods and their associated QA/QC documentation, and will therefore default to SW-846. Obviously, this scenario would not benefit the regulated community.

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